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OFFICE

May 6, 2013

VIA EMAIL (fhampton@fec.gov) AND CERTIFIED RETURN RECEIPT U.S. MAIL

Mr. Jeff S. Jordan, Esq.
General Counsel's Office
Federal Election Commission
999 E Street, NW
Washington, District of Columbia 20463

Re: MUR # 6720

Response of Jerry Labriola, Jr., Chairman and former Treasurer, Gary Schaffrick, Treasurer, and the Connecticut Republican State Central Committee to the Complaint Filed by Ronald Winter

Dear Mr. Jordan:

On behalf of Jerry Labriola, Jr., Chairman and former Treasurer, Gary Schaffrick, Treasurer, and the Connecticut Republican State Central Committee (the "Committee"), I write to respond to the Complaint filed by Ronald Winter in MUR #6720. The Committee ultimately received a copy of the Complaint on April 19, 2013, which was originally dated February 13, 2013 and hereby files its timely response.¹

The Complaint alleges that the Committee established a 527 account to solicit and accept funds from state sources for use in payment of federal debts. The Committee unequivocally denies this allegation - it did not use soft money to pay a hard money expenditure.

As you review the allegations in the Complaint, please consider the following additional facts, all of which are sworn to in the attached affidavit of Gary Schaffrick, the Committee's Campaign Treasurer:

¹ The Commission originally mailed the complaint on February 13, 2013 to our prior office address and was returned to the Commission as undeliverable. The Committee had properly filed its change of address with the Commission on April 19, 2012 and it was assigned a filing ID of IEC-779412. On April 19, 2013, Ms. Frankie Hampton contacted our office to inquire as to why we had not responded to this complaint. At that point she realized we had not received the complaint and she faxed it to our office and indicated the answer date was May 6, 2013.

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As detailed below, this complaint is the culmination of a long dispute between the Committee and Mr. Winter, arising out of work that he claims to have performed during the 2007-2008 federal cycle. Mr. Winter is obviously a biased individual with an agenda. He filed this complaint in the midst of a civil case, which the party recently settled with him in full.

Mr. Winter claims to have performed consulting work for the Committee in 2008, for which he was never paid. Consequently, Mr. Winter made demands upon the Committee for payment, but could not produce an agreement for such work. Four years later, on October 24, 2012, Mr. Winter filed a civil action against the committee demanding roughly \$4,000.00, which the party denied and defended. During the course of that proceeding, Mr. Winter filed this action with the FEC on January 7, 2013. On March 11, 2013 the committee settled the claim with Mr. Winter for \$3,500, from the Committee's Federal Account, a copy of Mr. Winter's release is enclosed.

Despite the scheme in which Mr. Winter alleges that the former Party Chairman apparently attempted to raise soft money to satisfy hard money expenditures, he fails to allege that he was actually paid with soft money. As noted above, he was only recently paid using hard dollars as required by law. Additionally, the Committee has no knowledge or information regarding fundraising solicitations made by its former Chairman in his campaign for RNC Chairman, or the former Chairman's use of the funds, if any, in the 527 account he apparently established for that reason.

This dispute is over four years old now. The amount in controversy is relatively small, and has indeed been settled between the parties. Mr. Winter does not allege, and does not have any evidence to prove that his hard money debt was paid using soft money funds. It was not. The Committee did not use state funds to settle a federal debt.

For these reasons, the Committee respectfully urges the Commission to dismiss this complaint because no violation occurred, or alternatively as not warranting any further use of the Commission's resources.

On behalf of the Committee, thank you in advance for your consideration of our position in light of the additional facts set forth in this letter. Please contact me by telephone at 860.543.1699 or e-mail to bryan@ctgop.org if you have questions or need additional information.

Sincerely,



Bryan Cafferelli
Connecticut Republican Party

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